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Before the
Federal Communication Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Replacement of Part 90	)	PR Docket 92-235
by Part 88 to Revise	)	
the Private Land Mobile	)	
Radio Services and Modify	)	
the Policies Governing them	)	

To: The Commission

COMMENT OF
Central Wyoming College
Licensee of KCWC-TV
2660 Peck Avenue
Riverton, WY 82501

Central Wyoming College submits its comments in response to the Commission's Notice of Proposed Rule Making in this proceeding.

1. We would encourage the Commission to consider less draconian measures than the establishment of entirely new bandwidth, modulation and power output requirements, when the problem could potentially be addressed through designation of "urban communications zones" which would provide for frequency realignment and establishment of narrow band requirements within those areas where spectrum availability is limited, leaving the remainder of the United States unaffected. Alternately, we would propose a stepped chart similar to that of Chart C-14 with the criteria of service area radius being replaced by a criteria of the population level within a 75 mile radius of the transmitter site. Time limits imposed by the required comment deadline prevent us from designing a complete chart, but we would propose that as a first level that areas with a population of 250,000 or less within a 75 mile radius of the transmitter site have authorized power levels of 300 watts ERP. Successive table elements would take into consideration areas of increasing population and antenna height until the more restrictive levels found in the current C-3 chart are reached in areas of high density population.

2. We ask that the comment period on the proposed rule-making be extended until July 30, 1993 in order to more fully evaluate the impact of the proposed changes and to make further recommendations to the Commission. In many parts of the country, winter weather conditions prevent or severely curtail the feasibility of performing such tests. We ask for the extension of the comment period in order to allow for system testing when weather conditions permit technical personnel easy access to transmitter sites in order to adjust existing systems to the new specifications and perform coverage tests during periods that will have a less serious effect on radio systems, businesses, and public safety operations. To perform such tests during the winter months would be difficult technically and could have a serious impact on the safety of property and lives.

3. Regarding § 88.429, we have very serious concerns about the power and antenna height limits and the effect on existing and future two-way radio systems. The severe restrictions placed on the Effective Radiated Power will have a serious detrimental effect on the feasibility and practicality of two-way radio systems.

One additional factor should be taken into consideration in formulating the power level charts such as chart C-3. This factor should be the population in an area prescribed by a circle of 75 mile radius from the transmitter. In densely populated areas, the power levels shown in the proposed chart may be a viable solution. In rural, mountainous, and areas of low population, the constraints placed on a two-way radio system by the proposed power levels would place an excessive burden on the two-way radio user for no reason. Especially in rural, low population areas, there is not sufficient justification for the drastically decreased transmit power levels. In these areas, the number of two-way radio systems is low enough that system coverage overlap with co-channel users will not be a serious issue as is found in areas of dense population. Users in rural, low population areas generally require two-way radio systems to cover a larger area than those in areas of dense population. Business, public safety, and local government users in rural areas need systems that will cover a large geographical area with the lowest possible number of transmitters in order to make a radio system economically feasible.

4. As for the General Category Pool and the proposal that all certified frequency coordinators be allowed to assign frequencies from this pool, we also have some reservations. If all coordinators are allowed to assign frequencies, a single, common and up-to-date database must be maintained for use by all coordinators. Multiple databases cannot be allowed. Allowing multiple databases to be maintained by various coordinators would cause continuous and harmful interference on the frequencies. The single database must be maintained by the Commission itself or a single designated contractor. The database requirements of this type of system will be quite enormous and the criteria for selecting a possible contractor will have to be carefully reviewed in order to ensure that the database is kept current, accurate and is available full time for access by the various coordinators.

An alternative solution may be to divide the United States into various "coordination zones" with a single coordinator for each zone. This would reduce the database requirements for each system to a more manageable level. The coordinators would need to have cooperative arrangements for systems that would overlap zone boundaries similar to the arrangements now in place for inter-service sharing and adjacent channel authorizations.

Respectfully submitted,

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KCWC-TV/Central Wyoming College